



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 18, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Brittany N. Benavidez, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed is an encrypted hard drive containing electronically stored information ("ESI") obtained by the government pursuant to search warrants, which has been designated "Sensitive Discovery Material" under the February 22 Order. The government requests that the defendant, upon copying the materials from the hard drive, return the hard drive to the government within two weeks. The materials on the hard drive include materials extracted from:

- Cellular telephones and tablets obtained from 349-351 Summit Avenue, Jersey City, New Jersey (the "Summit Premises"), during a search on November 10, 2016, which have been designated "Sensitive

Discovery Material” under the February 22 Order. (ESI 30898 – ESI 30899, ESI 30901 – ESI 30903, ESI 30909 – ESI 30912).¹

- Cellular telephones and tablets obtained from 210 Pavonia Avenue, Jersey City, New Jersey (the “Pavonia Premises”), during a search on November 10, 2016, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 30900, ESI 30904 – ESI 30908, ESI 30913).
- Documents obtained from the search of an external hard drive obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 30914 – ESI 32700).
- Documents obtained from, and pictures taken of, a Kyocera cellular telephone with IMEI number 014289001329633, obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 32701 – ESI 32710).
- Documents obtained from, and pictures taken of, a Kyocera cellular telephone with IMEI number 014289001334401, obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 32711 – ESI 32730).
- Documents obtained from, and pictures taken of, a Samsung cellular telephone with serial number RG7B613863V, obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 32731 – ESI 32782).
- Documents obtained from, and pictures taken of, a Samsung cellular telephone with IMEI number 359230/04/966301/6, obtained during the search of the Pavonia Premises, which have been designated

¹ Because of the way that these materials (and those obtained from cellular devices and tablets found at 210 Pavonia Avenue, Jersey City, New Jersey) were obtained and reviewed, the government was unable to designate documents relevant or irrelevant on a document-by-document basis; accordingly, if the government was able to identify one or more relevant or arguably exculpatory documents on a device, the government included the entire contents of that device in its production. The government does not represent that all of the contents of each device are relevant or arguably exculpatory.

“Sensitive Discovery Material” under the February 22 Order. (ESI 32783 – ESI 32789).

- Documents obtained from flash drives obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 32790 – ESI 34288).
- Documents obtained from the search of an HP Pavilion computer obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 34289 – ESI 35568).
- Documents obtained from the search of an ASUS laptop computer obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 35569 – ESI 36239).
- Documents obtained from the search of an HP Pavilion G7 computer obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 36240 – ESI 36841).
- Documents obtained from the search of a Dell Inspiron computer obtained during the search of the Pavonia Premises, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 36842 – ESI 37510).
- Documents, some of which depict the defendant, obtained from the search of external media obtained from the Pavonia Premises and from a vehicle outside of the Pavonia Premises during the search, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 37511 – ESI 37545).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Nicholas J. Moscow
Alexander A. Solomon
Douglas M. Pravda
Ian C. Richardson
Nicholas J. Moscow
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (ESI00030898-ESI00037545)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)